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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	NO. CR 14-0074 RS
)	
Plaintiff,)	
)	
v.)	
)	STIPULATION AND [PROPOSED] ORDER
JESUS RENE GARCIA-SANDOVAL,)	EXCLUDING TIME UNDER 18 U.S.C. § 3161
)	
)	
Defendant.)	

The parties in this case appeared before the Court on February 18, 2014. At that time, the parties represented to the Court that additional time would be required for the government to produce discovery and for defense counsel to review discovery and conduct investigations. As a result, the Court set the matter to March 18, 2014.

The parties have agreed to exclude the period of time between February 18, 2014, and March 18, 2014, from any time limits applicable under 18 U.S.C. § 3161. The parties agreed that granting the exclusion would maintain continuity of counsel and allow the reasonable time necessary for effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties also agreed that the ends of justice served by granting such an exclusion of time outweigh the best interests of the public and the

1 defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A). At the hearing, the Court made findings
2 consistent with this agreement.

3
4 SO STIPULATED:

5 MELINDA HAAG
6 United States Attorney

7 DATED: February 18, 2014

8 /s/
9 JANAKI GANDHI
Special Assistant United States Attorney

10 DATED: February 18, 2014

11 /s/
12 CANDIS MITCHELL
Attorney for Defendant Jesus Rene Garcia-
13 Sandoval
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~~[PROPOSED]~~ ORDER

For the reasons stated above and at the February 18, 2014, hearing, the Court finds that the exclusion from the time limits applicable under 18 U.S.C. § 3161 of the period from February 18, 2014, to March 18, 2014, is warranted and that the ends of justice served by the continuance outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A). Denying the requested exclusion of time would deprive the parties of the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv).

IT IS SO ORDERED.

DATED: 2/20/14


HONORABLE RICHARD SEEBORG
United States District Court Judge